

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

RENE LATHON,

Plaintiff,

v.

Civil Action No. 3:09cv00057

WAL-MART STORES EAST, LP,

Defendant.

MOTION FOR PROTECTIVE ORDER

Wal-Mart Stores East, LP (“Wal-Mart”), by counsel, hereby moves that the Court enter a Protective Order forbidding the plaintiff from conducting the two depositions noticed pursuant to Federal Rule of Civil Procedure 30(b)(6) and from obtaining additional discovery through two Requests for Production contained with the deposition notices. Wal-Mart files this motion pursuant to Rule 26(c) and the court’s Scheduling and Pretrial Order. Wal-Mart has filed a memorandum in support of this Motion.

WAL-MART STORES EAST, LP

By: /s/D. Cameron Beck, Jr.

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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